

CITY AUDITOR'S OFFICE



AUDIT OF DETENTION & ENFORCEMENT TRAINING UNIT

Report No. CAO 1401-0506-06

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CITY AUDITOR

TABLE OF CONTENTS

BACKGROUND	1
OBJECTIVE	1
SCOPE AND METHODOLOGY	2
FINDINGS AND RECOMMENDATIONS	2
1. TRAINING DATABASE LIMITATIONS.....	3
2. TRAINING DATABASE DIFFERENCES	5
3. FIREARM QUALIFICATIONS	6
4. 2004 P.O.S.T. REPORTING.....	9
5. INSTRUCTOR FILES	11
6. TRAINING OPERATIONS MANUAL.....	13
7. CLERICAL FUNCTIONS.....	15
8. D&E POLICY ISSUES	16
9. CLASS EVALUATIONS	18
MANAGEMENT RESPONSE	19

**AUDIT OF
DETENTION & ENFORCEMENT
TRAINING UNIT
CAO 1401-0506-06**

BACKGROUND

The Department of Detention and Enforcement (D&E) has 405 authorized positions and is comprised of three divisions including Field Services, Detention Services, and Support Services. Field Services includes the Deputy City Marshals (Marshals), Parking Enforcement, and Animal Control. Detention Services (including Correction Officers) maintains custody and control of inmates at the Mojave Detention Center. Support Services performs various administrative functions. D&E's Training Unit (Training) is within the Support Services division and has five staff including a Training Lieutenant, a Training Officer, and three tactical officers. Training oversees the operations of D&E's Southern Nevada Law Enforcement Academy (the Academy) and provides and monitors training for D&E employees.

Marshals are Category I peace officers and Correction Officers are Category III peace officers pursuant to Nevada Revised Statute 289. Marshals and Correction Officers must obtain the applicable Nevada Commission of Peace Officers' Standards and Training (P.O.S.T.) basic certification. To achieve this, recruits attend the Academy.

Annually, Marshals and Correction Officers are required to complete 24 hours of in-service training to maintain their P.O.S.T. certification. Nevada Administrative Code (NAC) 289 provides guidelines on annual training requirements. D&E is accredited through the Commission on Accreditation of Law Enforcement Agencies (CALEA) and the American Correctional Association (ACA). These organizations recommend additional training standards for Marshals and Correction Officers. D&E civilian employees receive annual training in accordance with D&E policy and CALEA and ACA standards. Training provides much of the in-service training to help D&E meet these standards.

OBJECTIVE

Our objectives in completing the audit of Training were to ensure that:

- Training is adequately monitoring the in-service training requirements of D&E staff.
- Training records are being adequately documented and maintained.
- Policies and procedures are adequate for Training's operations.
- Resources are being used efficiently.

SCOPE AND METHODOLOGY

Our fieldwork was performed in accordance with generally accepted government auditing standards. Procedures included:

- Interviewing city personnel and other municipality employees that have used the Academy.
- Obtaining clarification from P.O.S.T. on NAC regulations.
- Reviewing established policies and procedures.
- Testing established controls.
- Reviewing training documents.

The scope of our audit was limited to reviewing the functions of Training. Our testing included the review of 2005 training records and supporting records for the 2004 P.O.S.T. Individual Training Report. As P.O.S.T has already certified the Academy, we did not test the certification of the academy training program. In addition, we did not test the quality of the in-service training classes and instructors.

FINDINGS AND RECOMMENDATIONS

Our audit identified issues management should address relating to Training's operations. These issues are summarized in the following section. While other issues were identified and discussed with management, they were deemed less significant for reporting purposes.

1. TRAINING DATABASE LIMITATIONS

Criteria:

- According to D&E Policy ADM-1050:
 - “The training unit will maintain all training records for current and former department employees.”
 - “The Training and Education Administrator will review each employee’s training record quarterly.”
- Efficiencies can be achieved with systems that effectively support the functions of an organization.

Condition:

- Training uses a Microsoft Access database to monitor the training status of department personnel.
- The training database has inherent limitations and limited functionality as follows:
 - The database does not have an audit trail component to track additions, deletions, or changes to the system. It merely represents data at a point in time.
 - The database does not have decision making capabilities.
 - Access is not supported by the City’s Information Technology Department.
- The training database, as it is currently programmed, has additional limitations:
 - Officer compliance with specific annual training requirements cannot be automatically tracked by the database.
 - Instructor compliance with instructor training requirements (i.e., resumes on file, current instructor certifications, and training classes instructed during the year) is not automatically tracked by the database.
 - Data entry into the database requires entering each individual training class attended instead of selecting a class, indicating the instructor and attendee information, and having all attendees and instructor training records updated with a single entry.
 - The database does not identify duplicate entries.
 - The database does not cross years. Certain training requirements, such as instructor certifications, extend beyond one year.
 - The reports generated from the database are only listings, by employee, of classes attended during the year, date of class, and education hours received. There is no report indicating training deficiencies at a point in time.
- As a result of past recordkeeping inconsistencies in Training, D&E units have developed their own processes to independently track the training status of their own employees. The Marshals unit tracks training attended by its staff in a database similar to the one used by Training. Intake Services keeps a list of

training attended by their staff. Parking Enforcement tracks the training of their employees on a wall board.

- The quarterly review of the training status of D&E employees is a manual and very time consuming process.
- Training is currently evaluating alternative training software packages.

Cause:

- Many significant limitations in the current training database used by Training.
- The current training database does not effectively support the functions of Training.

Effect:

- Inconsistencies in data.
- Data entered more than once.
- Database does not provide training status of D&E personnel against D&E policies and P.O.S.T., ACA and CALEA standards.
- The review of the training status of D&E personnel must be completed manually by training personnel which requires much time and effort. This process is subject to human error and judgment.
- Other D&E units are unable to regularly verify the accuracy of the training database against their records.

Recommendation:

D&E management working with Training should evaluate alternative training software packages that will better meet the needs of Training and the entire Department. D&E management should purchase and implement new training software. The training software package should include, at a minimum, the following functions:

- Functions that allow for efficient, consistent, and accurate data entry of training attended.
- Decision making functions to allow for automatic evaluation of the training status of employees against D&E policies, and P.O.S.T., ACA, and CALEA standards.
- Read-only access and report generation capabilities by other D&E units for independent verification of the accuracy of their training records.
- Reporting functions that effectively summarize the training status of employees.
- Audit trail features to track changes to the system.

2. TRAINING DATABASE DIFFERENCES

Criteria:

The training database should accurately reflect training received by D&E personnel to allow for efficient and timely monitoring of the status of compliance with standards.

Condition:

- We tested the accuracy of the 2005 training database (through November 16, 2005) by tracing a sample of training data from the database to supporting documentation in the training files and data from the training files to the training database. Our testing found differences between the data in the database and that in the training files. These differences included differences in class dates, class titles, class hours, and class attendees.
- When tracing from the training database to supporting documentation in the training files, a 36% error rate (17 of 47) was found.
- When tracing from supporting documentation in the training files to the database, a 25 % error rate (85 of 336) was found.
- In testing the completeness of the employees included in the database, we identified that six civilian employees hired in 2005 were not included in the training database.

Cause:

- Database function limitations.
- Lack of a standard protocol for data input.
- Multiple staff using database without a standard protocol.

Effect:

- Inaccuracies in database can lead to inaccurate conclusions on the training status of staff.
- Inaccurate training data creates credibility issues with other D&E units who rely on Training to accurately maintain training data.

Recommendation:

Training should develop, document, and implement a standard protocol for data input into the training database. This protocol should include, at a minimum, the following:

- Standard course titles for classes attended by employees.
- Standards for identification of date of training when a training course is held over a period of days.
- Standards for documentation of authorized firearms.
- Standards for documentation of firearm qualifications, whether an officer passed or failed, and remedial training.
- Standards for entry of new employees into the database.

3. FIREARM QUALIFICATIONS

Criteria:

According to NAC 289.230(4), officers must qualify biannually with each firearm D&E has authorized them to use.

“As part of the continuing education required pursuant to subsection 1, an officer must: (a) If the officer is authorized to use a firearm, at least biannually demonstrate a minimum level of proficiency in the use of each firearm he is authorized to use. An officer who does not demonstrate a minimum level of proficiency with the use of any firearm he is authorized to use may not carry or use the firearm until he participates in a remedial course established by the employing agency to ensure that he achieves and maintains a satisfactory level of proficiency.”

According to D&E policies ADM-1053, ADM-1341, and ADM-1344:

- Officers must obtain authorization for all personally owned on-duty and off-duty firearms.
- Officers must qualify quarterly on all D&E issued firearms and personally owned on-duty and off-duty firearms.
- Officers may substitute the use of the firearms training simulator for one qualification.
- Officers who fail to meet the qualification standard during the quarterly qualification period are suspended from carrying a firearm. The suspension remains in effect until the employee qualifies.

Condition:

NAC requires that officers qualify twice a year on each firearm they are authorized to use. Training oversees firearm qualifications. Training documents firearm qualifications at the firing ranges on the On-Duty and Off-Duty Qualification Logs (qualification logs). Training then identifies that the officers attended a qualification in the training database. In 2005, officer attendance at rifle and shotgun qualifications was recorded on class sign-in sheets.

Firearms Qualification Records:

Training lacks sufficient information to effectively monitor the firearm qualification status of officers as noted below:

- The qualification logs used by Training are generated from a department personnel database (personnel database). Changes in officer firearms status are not being updated in the personnel database as they occur. Training personnel do not have the ability to directly make any changes to this data. Instead, the

- Training Officer provides manual adjustments to a department systems analyst to update the personnel database. As a result, officer firearms information is being added to the personnel database based on information gathered during qualifications *not* upon officers receiving authorization to use firearms.
- A process is not in place for updating the following officer firearm information in the personnel database and therefore, this information is not reflected in the qualification logs used by Training:
 - New firearm authorization requests
 - Discontinued use of firearms
 - Suspended firearm authorizations
 - Firearm assignment changes
 - Authorized firearm changes
 - Officer employment status changes
 - The qualification logs do not include the makes and models of on-duty firearms officers are authorized to use. Officers can be assigned multiple department issued firearms for specialized on-duty assignments (i.e., escort duty, dignitary assignments).
 - Training does not have information on who is “authorized to use” rifles and shotguns. Therefore, they do not know with assurance who should qualify with these firearms.
 - Training does not always receive qualification results from qualifications conducted outside of Training.
 - The current training database does not allow for effective monitoring of firearm qualifications due to the following:
 - The firearm with which an officer qualified is not identified in the training database.
 - Entries in the training database indicate when officers attend qualifications not whether officers have passed their qualifications.
 - The training database does not identify when officers fail their qualifications or qualify during remedial training.

Firing Range Access:

Training has limited access to firing ranges for use by the Academy and for quarterly firearms qualifications. Training must schedule use of the City of North Las Vegas firing range or public firing ranges.

During 2005, Training only scheduled two firearms qualification sessions. With only two sessions held, not all officers complied with D&E policy requiring quarterly firearms qualifications. We also noted that during the December 2005 qualification session, nine officers qualified on their firearms twice on the same day. While this practice complies legally with the NAC regulation for bi-annual firearms qualifications, the intent of the bi-annual firearms qualifications is to have officers show their proficiency once during the first half of the year and again in the second half of the year.

The limited access to firing ranges presents challenges and obstacles to D&E meeting firearms qualification requirements. D&E is currently evaluating various options to address this issue.

Firearms Training Simulator Access:

The firearms training simulator, located in the main classroom at the training facility, is a valuable tool that is cost effective, creates real time training scenarios, and represents a training aid that controls risk variables. D&E policy states that the simulator may be used for one of D&E's required quarterly firearms qualifications; however, there is no evidence in the 2005 training database that officers used the simulator for firearms qualifications. Certain staff noted that they would use the simulator if it was more accessible to them.

Cause:

- Deficient process and records for ensuring officers qualify on all firearms they are authorized to use.
- Lack of a City firing range.
- Limited access to firearms simulator.

Effect:

- Training is unable to determine whether all officers have qualified on all of their authorized firearms.
- Under current practices, officers may not qualify on all of their authorized firearms.

Recommendations:

1. D&E management should evaluate the firearms authorization and qualification documentation process and address the noted deficiencies. Once complete information is available, Training should implement procedures to track the qualification status of officers on all authorized firearms.
2. D&E management should take measures to improve the Department's access to firing ranges.
3. Training should evaluate and document how the firearms training simulator can be used more effectively in its training programs and take measures to improve access to the simulator to all city officers.

4. 2004 P.O.S.T. REPORTING

Criteria:

All Nevada Basic Certified officers must meet the mandatory 24-hour continuing education requirements set forth in NAC. The continuing education requirements include biannual qualifications with authorized firearms.

In accordance with NAC 289.230(1), D&E annually submits a P.O.S.T. Individual Training Report in which the department director attests to the following statement:

“With the exception of those Nevada Basic Certified officers listed on the reverse side, all Nevada Basic Certified officers of this agency pursuant to the Nevada Revised Statutes and the Nevada Administrative Code, have met the mandatory 24-hour continuing education requirements as set forth in the Nevada Administrative Codes.”

In addition to any officers who did not meet the continuing education requirements, the annual report is to “include all those who are on military activation, terminated, retired, or on medical leave who did not meet the continuing education requirements for the reporting year.”

Non-compliance by an officer with P.O.S.T. training requirements can result in the suspension of the officer’s certificate. An officer must obtain required training within 60 days of notification of non-compliance to avoid suspension of his certificate (NAC 289.239(3)).

The P.O.S.T. Individual Training Report, as well as D&E’s training records, should accurately reflect the status of officer training.

Condition:

- Our audit included reviewing whether the 2004 P.O.S.T. Individual Training Report (2004 Annual Report) included all reportable exceptions. Note: The 2004 Annual Report was the last report filed with P.O.S.T. at the time of our audit fieldwork.
- A comparison of the 2004 Annual Report to the 2004 training database found potential reportable exceptions not included in the report.
- At the request of D&E management, we subsequently reviewed 2004 source documentation that supported the entries into the training database (i.e., qualification logs, class sign-in sheets, firearm authorization forms) to confirm the validity of these potential reportable exceptions.
- This review confirmed the existence of reportable exceptions not included in the 2004 Annual Report. Other potential exceptions were identified where a conclusion could not be reached on whether they were reportable due to deficiencies in the source documentation.

- There was no documented reconciliation of the 2004 training records to the 2004 Annual Report.

Cause:

- Firearm qualification record and monitoring deficiencies (see Finding #3).
- Lack of a formal reconciliation of the 2004 Annual Report to the training records to ensure all exceptions were properly reported.

Effect:

- Incomplete 2004 Annual Report.

Recommendation:

Training should annually summarize P.O.S.T. training exceptions according to the training records and ensure the annual P.O.S.T. Individual Training Report properly reflects this information. Any known errors in the training records should be corrected so that the information in the training records supports the annual P.O.S.T. Individual Training Report. Training should follow-up on all reported training exceptions to ensure that officers maintain their proficiency in all required areas.

5. INSTRUCTOR FILES

Criteria:

In accordance with NAC 289.230(7), D&E must maintain documentation on instructors used including “the qualifications of each instructor who provides training” (i.e., a resume), “a description of the training provided” (i.e., lesson plans), and lists of each officer who completes training (i.e., course sign-in sheets).

In addition, NAC 289.280 and NAC 289.230 identify what instructors must do to maintain their instructor certificates and how instructors comply with continuing education requirements.

NAC 289.280(2) states: “To maintain an instructor certificate, an instructor must teach at least one class in the subject for which the certificate is issued during the year immediately preceding each anniversary date of the issuance of the certificate. An instructor must provide evidence of compliance with this requirement upon the request of the Executive Director.”

NAC 289.230(6) states: “An officer who is certified by the Executive Director to instruct courses in firearms, impact weapons or defensive tactics is not required to comply with the continuing education requirements of subsection 4 if the officer:

- a. Instructs a course in the subject for which his certificate is issued during each calendar year;
- b. Participates at least once every 3 years in a course of training for instructors that is approved by the Executive Director; and
- c. Demonstrates to the Commission or its designee at least once every 3 years proficiency in the subject that he instructs.”

According to D&E policy (ADM-1050), Training has the responsibility to conduct annual audits on all instructors to ensure training and/or special certification is current.

Condition:

Our audit included selecting a sample of instructors who taught in 2005. During our testing, we found the following:

- Not all of the resumes for the sample of instructors were available. A 2002 P.O.S.T. Category I Academy Audit finding stated that there were “no instructor resumes available for review.” While Training now has resumes for many instructors, some of the resumes are not well organized for accessibility.
- Instructor certificates supporting instructor compliance with NAC were not readily accessible but intermingled with other documentation within the training files.

- While the Training Officer appears to personally be aware of instructor compliance with NAC, there is no formal process in place to provide assurance that instructors are meeting all of the requirements set forth in NAC.
- Annual audits of instructor documentation as required by D&E policy are not being conducted or documented by Training.

Cause:

- Lack of formalized procedures for monitoring and documenting instructor compliance with NAC.

Effect:

- No reasonable assurance that instructors are in compliance with NAC requirements.

Recommendation:

Training should improve its monitoring of instructor compliance with NAC and D&E policy as follows:

- Create a formal process for monitoring and documenting compliance by instructors with NAC.
- Improve the organization of instructor documentation supporting compliance with NAC.
- Conduct annual audits of instructor documentation as required by D&E policy.

6. TRAINING OPERATIONS MANUAL

Criteria:

- An operations manual assists employees and management in performing the day-to-day functions of an organization and in implementing and monitoring adherence to policies. It also addresses the key activities and processes of an organization, how they are performed and by whom, and establishes accountability.
- Training operating procedures could be subject to scrutiny in lawsuits against officers as Training provides their initial and continued training. Therefore, it is important that operating procedures be well documented and followed.

Condition:

- Training does not have an operations manual covering all of its responsibilities and functions. While there is an Academy Staff Operations Manual, it covers only a part of Training's operations.
- The Training Officer is a valuable resource of institutional knowledge with a historical perspective of Training including P.O.S.T., CALEA, and ACA requirements, the academy and in-service training operations, and primary contacts at other agencies, divisions, and other city departments. Much of this institutional knowledge has not been formally documented.
- Officers rotated into Training for three-year assignments as tactical officers must learn Training operations on-the-job without access to an operations manual.

Cause:

- Limited documented standard operating procedures on Training's operations.

Effect:

- Over reliance on a person instead of documented operating procedures creates the potential of inaccuracies in applying standards, inconsistencies in the application of procedures, and the loss of information when that person becomes sick, takes extended vacation, or leaves employment.

Recommendation:

Training should create a Training Operations Manual that includes, at a minimum, the following elements:

- Training officer responsibilities for monitoring compliance with departmental training policies and the P.O.S.T., CALEA, and ACA requirements
- Training database use protocol (e.g., data entry standards, standard reports)
- Training records filing protocol
- Primary contact information for other divisions, departments, and agencies
- Annual training scheduling process

Audit of Detention & Enforcement
Training Unit
CAO 1401-0506-06
April 21, 2006

- Academy preparation process
- Academy Staff Operations Manual
- Process to monitor training required in an increment other than annually (e.g., biennial City mandated training)
- Process to monitor compliance with instructor education and certification requirements
- Internal and external reporting requirements
- Process to prepare the annual P.O.S.T. Individual Training Report
- Process for follow-up on reported P.O.S.T. training exceptions to ensure that officers maintain their proficiency in all required areas
- Responsibilities in supporting the Training Committee

7. CLERICAL FUNCTIONS

Criteria:

- Cost savings can often be achieved through the assignment of administrative functions to the appropriate job classification for these duties.

Condition:

- Training does not have clerical staff to perform administrative functions (i.e., answering the telephone, completing data input, filing of training documents, and monitoring of the training database).
- Many of the findings within this report show evidence of the need for clerical staff within Training.
- A recommendation was made in the 2002 P.O.S.T. Category I Academy Audit that “one clerical support staff is warranted to handle basic filing and other clerical duties.”
- Without clerical staff, Training commissioned staff must perform many administrative functions. During 2005, two Training employees were paid a total of \$56,185 in overtime. While it is unknown how much the clerical functions contributed to the overtime charges, each hour devoted to basic clerical functions represents an hour not available to coordinate or instruct training classes.
- In evaluating the cost effectiveness of having a commissioned staff perform clerical functions, we compared the mid-range salary and benefits for an Office Specialist I to a Marshal’s mid-range salary and benefits as follows:

Marshal (mid-range base salary and 45% for benefits)	\$ 83,726
Office Specialist I (mid-range base salary and 38% for benefits)	<u>49,818</u>
Annual Salary and Benefit Difference:	<u>\$ 33,908</u>

- Cost savings and operational efficiencies could be achieved through the assignment of clerical staff to Training.

Cause:

- Lack of dedicated clerical staff within Training.

Effect:

- Commissioned officers are performing many administrative functions that reduce the time they have to perform their primary functions of coordinating and providing training.

Recommendation:

D&E management should evaluate and document the feasibility of assigning clerical staff to support Training operations.

8. D&E POLICY ISSUES

Criteria:

Submission of Training Information

- D&E supervisors are to “ensure information is forwarded to the training unit following completion of training by subordinates.” This information is to include: date & type of training, certificates received, and test scores. (ADM-1050)

Impact Tools Training

- In accordance with NAC 289.230, sworn member staff must receive a minimum of 24 hours of training annually or face having their P.O.S.T. certificate suspended. At a minimum, this training includes...Impact Tools Training (minimum of 4 hours per impact weapon) (ADM-1053)

Civilian Staff Training

- In accordance with D&E policy:
 - Clerical and Support Staff with daily or regular inmate contact are to receive 16 hours of in-service training each year. (ADM-1052)
 - Civilian Staff with daily inmate contact are to receive 40 hours of training annually. (ADM-1053)

Administrative Officer Responsibilities

- In accordance with D&E policy (ADM-1341 and ADM-1344), the Administrative Officer is to perform the following functions:
 - Maintain a list of officers authorized to carry a firearm off-duty and provide the list to the Training and Education Administrator each qualifying period.
 - Send a report to the Chief when notified that an officer fails to meet the qualification requirement.

Condition:

During our audit, we identified the following D&E policy issues:

Submission of Training Information

- Training documentation for many civilian staff is not submitted to Training “following completion of training” as required by D&E policy.
- Some training documentation on civilian staff is not submitted to Training until year end.

Impact Tools Training

- D&E policy requires 4 hours of Impact Tools Training per impact weapon. In 2005, Marshals only attended a 3 hour Impact Weapon course.

Civilian Staff Training

- There is a difference between two D&E policies on the required training for civilian employees. One policy (ADM 1052) states *clerical and support staff* with daily or regular inmate contact will receive 16 hours of in-service training each year. Another policy (ADM 1053) states *civilian staff* with daily inmate

contact should receive 40 hours of training annually. Clerical staff, support staff, and civilian staff are terms that are all synonymous and therefore, there should be no difference in requirements for these staff.

- Training is following policy ADM 1053; however, during our meetings with D&E staff, we noted some uncertainty on this policy.

Administrative Officer Responsibilities

- The current Administrative Officer does not perform the functions noted in ADM 1341 and 1344.

Cause:

- Lack of timely submission of training information by some D&E units.
- Conflicting department policies.

Effect:

- Without timely submission of training information, Training is unable to adequately monitor the training status of D&E employees, inform employees of deficiencies, and appropriately plan for needed in-service training.
- Conflicting policies create confusion on requirements.

Recommendation:

D&E management should further emphasize to D&E employees the importance of the timely submittal of training information to Training. Training should inform the Training Committee and D&E management of employees and/or D&E units who fail to submit timely training information. D&E management should provide clarification on the noted conflicting practices and policies and adjust documented policies as needed.

9. CLASS EVALUATIONS

Criteria:

Among the responsibilities of the Training Committee, D&E policy (ADM-1050) states that the Committee is to perform the following functions:

- Evaluate D&E pre-service and in-service training programs.
- Update factors having an impact on D&E training programs for all employees.
- Recommend appropriate updates and revisions.

An important measure of the success of a training program is feedback, both positive and negative, from those individuals who have attended the classes.

Condition:

- At the completion of each academy and in-service class, evaluations are completed by those in attendance.
- The evaluations solicit feedback on the subject matter taught, instructor performance, and the class environment.
- The evaluations are attached to the respective class sign-in sheet and filed in Training filing cabinets.
- While these evaluations are reviewed by Training staff, the evaluation results are not summarized and made available to the Training Committee or D&E management.
- Information from class evaluations could provide valuable information to the Training Committee and D&E management in evaluating the effectiveness of training being conducted.

Cause:

- Lack of a process for summarizing evaluation comments for the Training Committee and D&E management.

Effect:

- Lack of valuable performance information on training for the Training Committee and D&E management.

Recommendation:

Training should create a periodic report to share information obtained from the Academy and in-service training class evaluations with the Training Committee and D&E management. Consideration should be given to implementing on-line evaluations to allow for easier access to evaluation information and to facilitate the reporting of the information.

MANAGEMENT RESPONSE

1. TRAINING DATABASE LIMITATIONS

Recommendation: D&E management working with Training should evaluate alternative training software packages that will better meet the needs of Training and the entire Department. D&E management should purchase and implement new training software. The training software package should include, at a minimum, the following functions:

- Functions that allow for efficient, consistent, and accurate data entry of training attended.
- Decision making functions to allow for automatic evaluation of the training status of employees against D&E policies, and P.O.S.T., ACA, and CALEA standards.
- Read-only access and report generation capabilities by other D&E units for independent verification of the accuracy of their training records.
- Reporting functions that effectively summarize the training status of employees.
- Audit trail features to track changes to the system.

Management Plan of Action: Management and training have evaluated alternative training software packages. We are in the process of selecting a package with input from City Information Technologies. Once the software has been purchased, implementation will include training and configuration.

Estimated Date of Completion: December 2006

2. TRAINING DATABASE DIFFERENCES

Recommendation: Training should develop, document, and implement a standard protocol for data input into the training database. This protocol should include, at a minimum, the following:

- Standard course titles for classes attended by employees.
- Standards for identification of date of training when a training course is held over a period of days.
- Standards for documentation of authorized firearms.
- Standards for documentation of firearm qualifications, whether an officer passed or failed, and remedial training.
- Standards for entry of new employees into the database.

Management Plan of Action: A standard protocol for data entry has been developed and is a component of the specifications identified for the software evaluation. Once the

Audit of Detention & Enforcement
Training Unit
CAO 1401-0506-06
April 21, 2006

software has been selected and purchased, implementation will include training and configuration.

Estimated Date of Completion: December 2006

3. FIREARM QUALIFICATIONS

Recommendation 3.1: D&E management should evaluate the firearms authorization and qualification documentation process and address the noted deficiencies. Once complete information is available, Training should implement procedures to track the qualification status of officers on all authorized firearms.

Management Plan of Action: D&E identified, evaluated, and purchased a firearms program capable of meeting all noted deficiencies.

Estimated Date of Completion: August 2006

Recommendation 3.2: D&E management should take measures to improve the Department's access to firing ranges.

Management Plan of Action: Recommendation satisfied. D&E entered into an agreement with an indoor shooting range. This creates more flexibility and regularity to accommodate qualifications.

Estimated Date of Completion: Completed

Recommendation 3.3: Training should evaluate and document how the firearms training simulator can be used more effectively in its training programs and take measures to improve access to the simulator to all city officers.

Management Plan of Action: The firearms training simulator is available with a firearms instructor for officers to utilize on the third week of every month. It may be additionally scheduled upon officer request submitted to the training unit. Policy has been revised to reflect this.

Estimated Date of Completion: Policy revision will be reviewed by applicable labor unions and ready for dissemination July 2006.

4. 2004 P.O.S.T. REPORTING

Recommendation: Training should annually summarize P.O.S.T. training exceptions according to the training records and ensure the annual P.O.S.T. Individual Training Report properly reflects this information. Any known errors in the training records should be corrected so that the information in the training records supports the annual P.O.S.T. Individual Training Report. Training should follow-up on all reported training exceptions to ensure that officers maintain their proficiency in all required areas.

Management Plan of Action: A policy has been created stating that annually, the Professional Standards Unit will audit the peace officer training records to ensure they are in accordance with NAC and all exceptions will be forwarded to P.O.S.T.

The 2004 list of exceptions has been forwarded to P.O.S.T. (June 2006)

Estimated Date of Completion: Policy revision will be reviewed by applicable labor unions and ready for dissemination July 2006.

5. INSTRUCTOR FILES

Recommendation: Training should improve its monitoring of instructor compliance with NAC and D&E policy as follows:

- Create a formal process for monitoring and documenting compliance by instructors with NAC.
- Improve the organization of instructor documentation supporting compliance with NAC.
- Conduct annual audits of instructor documentation as required by D&E policy.

Management Plan of Action: A policy has been revised stating that bi-annually, the Training Unit will audit the instructors' certifications and ensure they are in accordance with NAC and D&E policy.

Estimated Date of Completion: Policy revision will be reviewed by applicable labor unions and ready for dissemination July 2006.

6. TRAINING OPERATIONS MANUAL

Recommendation: Training should create a Training Operations Manual that includes, at a minimum, the following elements:

- Training officer responsibilities for monitoring compliance with departmental training policies and the P.O.S.T., CALEA, and ACA requirements
- Training database use protocol (e.g., data entry standards, standard reports)

- Training records filing protocol
- Primary contact information for other divisions, departments, and agencies
- Annual training scheduling process
- Academy preparation process
- Academy Staff Operations Manual
- Process to monitor training required in an increment other than annually (e.g., biennial City mandated training)
- Process to monitor compliance with instructor education and certification requirements
- Internal and external reporting requirements
- Process to prepare the annual P.O.S.T. Individual Training Report
- Process for follow-up on reported P.O.S.T. training exceptions to ensure that officers maintain their proficiency in all required areas
- Responsibilities in supporting the Training Committee

Management Plan of Action: The first draft of a Training Operations Manual has been circulated for review, to include input and feedback.

Estimated Date of Completion: August, 2006

7. CLERICAL FUNCTIONS

Recommendation: D&E management should evaluate and document the feasibility of assigning clerical staff to support Training operations.

Management Plan of Action: Recommendation satisfied. Clerical position has been assigned to the Training Unit and we are presently in the selection process.

Estimated Date of Completion: Completed

8. D&E POLICY ISSUES

Recommendation: D&E management should further emphasize to D&E employees the importance of the timely submittal of training information to Training. Training should inform the Training Committee and D&E management of employees and/or D&E units who fail to submit timely training information. D&E management should provide clarification on the noted conflicting practices and policies and adjust documented policies as needed.

Management Plan of Action: Policy revision reflects employee training documentation will be submitted within thirty days of when training has been completed.

Audit of Detention & Enforcement
Training Unit
CAO 1401-0506-06
April 21, 2006

Estimated Date of Completion: Policy revision will be reviewed by applicable labor unions and ready for dissemination July 2006.

9. CLASS EVALUATIONS

Recommendation: Training should create a periodic report to share information obtained from the Academy and in-service training class evaluations with the Training Committee and D&E management. Consideration should be given to implementing on-line evaluations to allow for easier access to evaluation information and to facilitate the reporting of the information.

Management Plan of Action: Class evaluations will be reviewed and presented during the quarterly Training Committee Meetings. Training has developed a template for electronic implementation.

Estimated Date of Completion: July 12, 2006